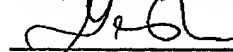


Reconsideration of the application is respectfully requested, if view of the following remarks.

The Office rejects the present claims based on Lomneth et al. US Patent No. 4,388,339 as the primary reference in view of its teaching of 32 to 50% SOS. But, as pointed out previously, "S" for Lomneth et al. includes both stearic and palmitic moieties. Moreover, it can be seen in col. 27 (lines 42, et seq.), that for the palm mid-fraction, the level of stearic acid moieties is very low. Palm mid-fraction is used by Lomneth et al. in Embodiment 1, together with soybean oil. (Lomneth's Embodiment 2 is said to be formulated from the same aqueous and oil phase ingredients.) In addition, in Col. 8, first full paragraph, Lomneth et al. indicate that it is believed that the predominant SOS and SSS triglycerides of the structural fat are POP and PPP. And in col. 7, (lines 49-50) they indicate that the P:St ratio is about 8.5 or higher.

The Office has pointed to no teaching by Lomneth et al. that a fat having the recited SOS characteristics should be employed. The above-cited portions of Lomneth et al. appear to suggest low, rather than high, levels of stearic moieties within Lomneth's SOS molecules. Therefore, it is not apparent in what way Lomneth is suitable as a primary reference to establish a prima facie case of obviousness. It is respectfully requested that the application rejection be withdrawn and that the application be allowed.

Respectfully submitted,



Gefard J. McGowan, Jr.
Attorney for Applicant(s)
Reg. No. 29,412

/gjm
(201) 894-2297